

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED
2023 SEP 29 AM 8:57
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UNITED STATES OF AMERICA)
) NO. 2:22-cr-155-1
v.)
)
HARLEY DAVIS) (18 U.S.C. § 922(a)(6))

SUPERSEDING INFORMATION

The U.S. Attorney charges:

COUNT 1

On or about May 5, 2022, in the District of Vermont, HARLEY DAVIS, in connection with the acquisition of a Glock, model 43, 9mm semi-automatic pistol, serial number AGPF146, from Lost Nation Gun Shop, a federally licensed firearms dealer, knowingly made a false or fictitious oral or written statement intended or likely to deceive a federal firearms dealer with respect to a material fact to the lawfulness of the sale of a firearm, specifically HARLEY DAVIS stated she was not a user of controlled substances when in fact and as she knew well, HARLEY DAVIS was a user of controlled substances.

(18 U.S.C. §922(a)(6))

COUNT 2

On or about May 21, 2022, in the District of Vermont, HARLEY DAVIS, in connection with the acquisition of Glock, model 42, .380 caliber semi-automatic pistol, serial number AGAX929, from Lost Nation Gun Shop, a federally licensed firearms dealer, knowingly made a false or fictitious oral or written statement intended or likely to deceive a federal firearms dealer with respect to a material fact to the lawfulness of the sale of a firearm, specifically HARLEY DAVIS stated she was not a user of controlled substances when in fact and as she knew well, HARLEY DAVIS was a user of controlled substances.

(18 U.S.C. §922(a)(6))

COUNT 3

On or about May 21, 2022, in the District of Vermont, HARLEY DAVIS, in connection with the acquisition of Glock, model 42, .380 semi-automatic pistol, serial # ABCP921, from M&R Guns & Ammo, a federally licensed firearms dealer, knowingly made a false or fictitious oral or written statement intended or likely to deceive a federal firearms dealer with respect to a material fact to the lawfulness of the sale of a firearm, specifically HARLEY DAVIS stated she was not a user of controlled substances when in fact and as she knew well, HARLEY DAVIS was a user of controlled substances.

(18 U.S.C. §922(a)(6))

A handwritten signature in black ink that reads "Nikolas P. Kerest (EAPC)". The signature is written in a cursive style with a large, sweeping flourish at the end.

NIKOLAS P. KEREST (EAPC)
United States Attorney
Burlington, Vermont
September 29, 2023